

Page 3

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(Continued.)

2

3 CALLAN, KOSTER, BRADY & BRENNAN, LLP
4 Attorneys for Defendant
5 DR. LILIAN ALDANA-BERNIER
6 One Whitehall Street
7 New York, New York 10004
8 BY: MATTHEW J. KOSTER, ESQ.

9

10 MARTIN CLEARWATER & BELL, LLP
11 Attorneys for Defendant
12 JAMAICA HOSPITAL MEDICAL CENTER
13 220 East 42nd Street
14 New York, New York 10017
15 BY: BRIAN OSTERMAN, ESQ.

16

Also Present: Magdalena Bauza

17

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Page 4

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S T I P U L A T I O N S:

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4

IT IS HEREBY STIPULATED AND AGREED by and
between the attorneys for the respective
parties hereto, that this examination may be
sworn to before any Notary Public.

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Page 5

1

2 E L I S E H A N L O N, a Non-Party Witness
3 herein, having been first duly sworn by a
4 Notary Public within and for the State of
5 New York, was examined and testified as
6 follows:

7

8 EXAMINATION BY

9 MR. SMITH:

10

11 Q. Will you state your name and
12 address for the record, please.

13 A. Elise Hanlon.

14 MR. SHAFFER: 100 Church Street,
15 New York, New York.

16 MR. SMITH: We are going on the
17 record, it's 10:19. We are at my
18 office, Nathaniel Smith, 111 Broadway,
19 suite number 1305. Starting the
20 deposition of Elise Hanlon.

21 THE WITNESS: Yes.

22 MR. SHAFFER: Before we start, I
23 just ask that the witness be given a
24 chance to review the transcript that's
25 generated here today pursuant to

Page 6

1 ELISE HANLON

2 Federal Rule 30 (e)(1).

3 MR. SMITH: Okay. And before we
4 start with the witness, are you
5 representing the witness?

6 MR. SHAFFER: Correct.

7 MR. SMITH: Will you accept
8 service of process of any trial
9 subpoenas or any subpoenas required for
10 the witness to appear because you have
11 given the 100 Church Street address,
12 which is the Law Department address,
13 right?

14 MR. SHAFFER: That is correct.
15 If that address changes you will be
16 notified immediately upon its change.

17 MR. SMITH: You're not answering
18 my question --

19 MR. SHAFFER: Yes.

20 MR. SMITH: Will you accept
21 service of process? Otherwise, I will
22 need to have the witness' personal
23 address.

24 MR. SHAFFER: The same as it's
25 been in every other deposition.

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Page 7

1 ELISE HANLON

2 MR. SMITH: Which is?

3 MR. SHAFFER: Yes. Contingent
4 upon us still representing the witness
5 and if not, you will be notified of
6 that change immediately and you will
7 have a new address forthwith.8 MR. SMITH: I will need, not
9 just an address, but also contact
10 information.

11 MR. SHAFFER: Correct.

12 Q. Morning, ma'am.

13 A. Good morning.

14 Q. My name is Nathaniel Smith. I'm
15 representing Adrian Schoolcraft in the
16 lawsuit against various individuals
17 including the City of New York.18 This morning I am going to be
19 asking you a series of questions and there's
20 only one really important rule since you're
21 under oath and that is that you understand
22 my question and you answer the question to
23 the best of your ability.

24 Do you understand that?

25 A. Yes.

Page 8

1 ELISE HANLON

2 Q. It's important that if there is
3 something unclear about my question that you
4 let me know; okay?

5 A. Yes.

6 Q. And the reason why that's
7 important is because the court reporter is
8 taking down the questions that I'm asking
9 and the answers that you're providing and if
10 you don't say I don't understand or it's not
11 clear or could you rephrase that and you
12 just answer the question, then your
13 statements which, like I said, are being
14 taken under oath, will reflect those
15 statements. So it's important for you and
16 for the record and for me that you express
17 any confusion you may have about the
18 question; okay?

19 A. Yes.

20 Q. Just because I'm a lawyer and
21 I'm wearing a tie doesn't mean that my
22 questions are formed well. Sometimes
23 they're formed badly. In that case, please
24 let me know; okay?

25 A. Yes.

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1 ELISE HANLON

2 Q. Are you currently employed?

3 A. Yes.

4 Q. By whom?

5 A. New York City Fire Department.

6 Q. How long have you been employed
7 by the New York City Fire Department?

8 A. Since 1991.

9 Q. And what did you do before the
10 fire department?

11 A. I worked for a private
12 ambulance company.

13 Q. Which one?

14 A. Mercy.

15 Q. Where is Mercy?

16 A. No longer in existence.

17 Q. Is Mercy an ambulance service or
18 was it a hospital?

19 A. Ambulance service.

20 MR. SHAFFER: Objection.

21 Q. Where was it located?

22 A. Island Park.

23 Q. Where is that?

24 A. Long Island.

25 Q. How long did you work for Mercy?

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Page 10

1 ELISE HANLON

2 A. A year.

3 Q. And were you an EMT at Mercy?

4 A. Yes.

5 Q. What did you do before working
6 for Mercy?

7 A. I worked for Nationwide
8 Ambulance.

9 Q. And Nationwide is another
10 private ambulance service?

11 A. Yes.

12 Q. Where are they located?

13 A. No longer in existence.

14 Q. Where were they located?

15 A. Rockaway.

16 Q. Rockaway, Queens?

17 A. Yes.

18 Q. Were you an EMT for Nationwide?

19 A. Yes.

20 Q. How long did you work for them?

21 A. About a year.

22 Q. What did do you before working
23 for Nationwide?

24 A. In school.

25 Q. What school?

Page 270

1 ELISE HANLON

2 A. No.

3 Q. Have you ever seen any police
4 officer or another law enforcement officer
5 EDP?

6 A. No.

7 Q. Have you ever seen a chief or
8 assistant chief for the NYPD at a scene
9 where there was a potential or actual EDP
10 situation?

11 MR. SHAFFER: Objection.

12 A. Not that I recall.

13 MR. SMITH: All right, I don't
14 have anymore questions. Thank you very
15 much. For now I don't have anymore
16 questions.

17 EXAMINATION BY

18 MR. OSTERMAN:

19 Q. Lieutenant, I just have a few
20 very quick.

21 Other than what you testified to
22 here today, did you have any contact or
23 speak with any other staff or personnel at
24 Jamaica Hospital at any time regarding Mr.
25 Schoolcraft or the incident on October 31,

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1 ELISE HANLON

2 2009?

3 A. No.

4 Q. Did you have any contact or
5 speak with any doctors or nurses at Jamaica
6 Hospital regarding Mr. Schoolcraft or the
7 incident on October 31, 2009?

8 A. No.

9 Q. Did you instruct or direct
10 anyone to speak or contact anyone at Jamaica
11 Hospital?

12 A. No.

13 Q. Did you speak with a Dr. Isakov
14 at any time?

15 A. No.

16 Q. Did you speak with a Dr.
17 Aldana-Bernier at any time?

18 (Continued on next page to
19 include Jurat.)

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1 Page 1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 ADRIAN SCHOOLCRAFT,

6 Plaintiff,

7

8 Case No:

9 - against - 10 CV 06005

10

11 THE CITY OF NEW YORK, ET AL.,

12 CONFIDENTIAL

13

14 Defendants.

15 -----X

16

17 111 Broadway

18

19 New York, New York

20

21 April 10, 2014

22

23 10:34 a.m.

24

25

CONFIDENTIAL DEPOSITION OF TIMOTHY TRAINOR,
pursuant to Notice, taken at the above place,
date and time, before DENISE ZIVKU, a Notary
Public within and for the State of New York.

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1 APPEARANCES: 2 NATHANIEL B. SMITH, ESQ. 3 Attorneys for Plaintiff 4 111 Broadway 5 New York, New York 10006 6 7 JOHN LENOIR, ESQ. 8 Attorneys for Plaintiff 9 829 Third Street NE 10 Washington, D.C. 20002 11 12 NEW YORK CITY LAW DEPARTMENT 13 OFFICE OF CORPORATION COUNSEL 14 Attorneys for Defendant 15 THE CITY OF NEW YORK 16 100 Church Street 17 New York, New York 10007 18 BY: SUZANNA PUBLICKER METTHAM, ESQ. 19 20 SCOPPETTA SEIFF KRETZ & ABERCROMBIE 21 Attorneys for Defendant 22 STEVEN MAURIELLO 23 444 Madison Avenue 24 New York, New York 10022 25 BY: WALTER A. KRETZ, JR., ESQ. 19 20 21 22 23 24 25 1 (Continued.) 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 2 1 STIPULATIONS: 2 IT IS HEREBY STIPULATED AND AGREED by 3 and between the attorneys for the respective 4 parties hereto, that this examination may be 5 sworn to before any Notary Public. 6 7 IT IS FURTHER STIPULATED AND AGREED 8 that the filing and certification of the said 9 examination shall be waived. 10 11 IT IS FURTHER STIPULATED AND AGREED 12 that all objections to questions, except as to 13 the form of the question, shall be reserved 14 for the time of trial. 15 16 17 18 19 20 21 22 23 24 25 Page 3 1 (Continued.) 2 3 CALLAN, KOSTER, BRADY & BRENNAN, LLP 4 Attorneys for Defendant 5 DR. LILIAN ALDANA-BERNIER 6 One Whitehall Street 7 New York, New York 10004 8 BY: MATTHEW J. KOSTER, ESQ. 9 10 MARTIN CLEARWATER & BELL, LLP 11 Attorneys for Defendant 12 JAMAICA HOSPITAL MEDICAL CENTER 13 220 East 42nd Street 14 New York, New York 10017 15 BY: BRIAN OSTERMAN, ESQ. 16 17 18 19 20 21 22 23 24 25 Page 5 1 (WHEREUPON, THE FOLLOWING 2 TRANSCRIPT WAS DESIGNATED CONFIDENTIAL 3 BY COUNSEL PURSUANT TO PROTECTIVE 4 ORDER.) 5 6 MR. SMITH: We are going on the 7 record, it is 10:34. We are taking the 8 deposition of Captain Timothy Trainor 9 at my offices, 111 Broadway. Today is 10 April 10, 2014. 11 TIMOTHY TRAINOR, a Defendant 12 herein, having been first duly sworn by a 13 Notary Public within and for the State of 14 New York, was examined and testified as 15 follows: 16 17 EXAMINATION BY 18 MR. SMITH: 19 20 Q. Will you state your name and 21 address for the record, please. 22 A. My name is Timothy, Last name is 23 Trainor, spelled T-r-a-i-n-o-r. My address 24 is One Police Plaza, New York, New York 25 10038.
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<p style="text-align: right;">Page 6</p> <p>1 TIMOTHY TRAINOR 2 MR. SMITH: Ms. Mettham, we have 3 the same agreement with respect to 4 Captain Trainor, which is if there is a 5 trial where I need to serve process you 6 will accept service of process on his 7 behalf.</p> <p>8 MS. PUBLICKER METTHAM: To the 9 extent we're still representing him, 10 yeah.</p> <p>11 MR. SMITH: Otherwise, you will 12 provide me with information where I can 13 effectuate service?</p> <p>14 MS. PUBLICKER METTHAM: Yes.</p> <p>15 MR. SMITH: Okay, great.</p> <p>16 Q. Good morning, Captain.</p> <p>17 A. Good morning.</p> <p>18 Q. As I indicated earlier when we 19 were off the record, my name is Nathaniel 20 Smith. I represent Adrian Schoolcraft. I 21 am going to be asking you some questions 22 this morning and this afternoon.</p> <p>23 There is a few ground rules, 24 maybe you know them, maybe you don't. I 25 just want to express the most important one,</p>	<p style="text-align: right;">Page 8</p> <p>1 CONFIDENTIAL - TIMOTHY TRAINOR 2 A. I work in the police 3 commissioner's office.</p> <p>4 Q. What do you do with the police 5 commissioner's office?</p> <p>6 A. I am the head of his security 7 detail.</p> <p>8 Q. Who do you report to?</p> <p>9 A. Deputy Chief James O'Neil.</p> <p>10 Q. How many people report to you?</p> <p>11 MS. PUBLICKER METTHAM: 12 Objection. You could answer.</p> <p>13 A. Thirteen.</p> <p>14 Q. Are any of these 13 people 15 involved in this case, to your knowledge?</p> <p>16 MS. PUBLICKER METTHAM: 17 Objection.</p> <p>18 A. No.</p> <p>19 Q. How long have you had this 20 position as captain and the head of security 21 detail for the commissioner?</p> <p>22 A. I started on December 12, 2013.</p> <p>23 Q. Prior to that what did you do?</p> <p>24 A. Prior to this assignment I was 25 commanding officer of the Brooklyn North</p>
<p style="text-align: right;">Page 7</p> <p>1 CONFIDENTIAL - TIMOTHY TRAINOR 2 which is that it's important since you've 3 just been sworn to tell the truth that you 4 understand the question. You understand 5 that, right?</p> <p>6 A. I understand.</p> <p>7 Q. And you understand that you're 8 under oath and you're obligated to tell the 9 truth?</p> <p>10 A. Yes.</p> <p>11 Q. And as part of that oath, it's 12 important that you understand the question, 13 right?</p> <p>14 A. Yes.</p> <p>15 Q. So if there's anything about my 16 question that's unclear or you're unsure, 17 please let me know and I will try to 18 rephrase it.</p> <p>19 A. Understood.</p> <p>20 Q. Where are you currently working?</p> <p>21 A. One Police Plaza.</p> <p>22 Q. What's your position?</p> <p>23 A. Captain.</p> <p>24 Q. Do you work in a particular 25 division?</p>	<p style="text-align: right;">Page 9</p> <p>1 CONFIDENTIAL - TIMOTHY TRAINOR 2 Investigations Unit.</p> <p>3 Q. For what period of time were you 4 the commanding officer of Brooklyn North 5 investigations Unit?</p> <p>6 A. I was the commanding officer of 7 the Brooklyn North Investigations Unit from 8 July of 2002, until December 11, 2013.</p> <p>9 Q. As the commanding officer of 10 Brooklyn North Investigations Unit, who did 11 you report to?</p> <p>12 MS. PUBLICKER METTHAM: 13 Objection. You could answer.</p> <p>14 A. I reported to the patrol borough 15 adjutant.</p> <p>16 Q. Was that one individual during 17 that period of time that you were the 18 commanding officer?</p> <p>19 A. It was many different 20 individuals.</p> <p>21 Q. Can you identify who the 22 individuals for whom you were reporting to 23 from 2009 through the end of 2013?</p> <p>24 MS. PUBLICKER METTHAM: 25 Objection. You can answer.</p>

Page 246		Page 248	
1	CONFIDENTIAL - TIMOTHY TRAINOR	1	CONFIDENTIAL - TIMOTHY TRAINOR
2	best I could remember, we were getting	2	Jamaica Hospital at any time?
3	information, you know, that the NYPD, you	3	A. Regarding Schoolcraft?
4	know, the rant boards use these bulletin	4	Q. Correct.
5	boards, people were just talking. This is	5	A. Never.
6	information that was out in the	6	Q. Did you ever direct anybody from
7	stratosphere. When I learned about it, I	7	the NYPD to speak to anybody at Jamaica
8	just simply can't give you the date I knew.	8	about Mr. Schoolcraft?
9	Q. Okay. I understand, thank you.	9	A. Never.
10	Have you ever had any contact	10	MR. LEE: Thank you.
11	with any personnel from Jamaica Hospital?	11	(Time noted: 5:49 p.m.)
12	A. Never.	12	_____
13	MR. SMITH: All right, I want to	13	TIMOTHY TRAINOR
14	take two minutes. Check with my	14	
15	colleague. I think I'm almost done.	15	Subscribed and sworn to before me this
16	Going off the record, it's 5:45.	16	
17	(Whereupon, a recess was taken.)	17	_____ day of _____ 2014.
18	MR. SMITH: Going back on the	18	
19	record, it's 5:49. Thank you very	19	_____, Notary
20	much, Captain, I don't have any more	20	Public.
21	questions at this time.	21	
22	MS. PUBLICKER METTHAM: I have	22	
23	just a couple.	23	
24	EXAMINATION BY	24	
25	MS. PUBLICKER METTHAM:	25	
Page 247		Page 249	
1	CONFIDENTIAL - TIMOTHY TRAINOR	1	I-N-D-E-X
2	Q. Captain Trainor, did you ever go	2	
3	to Schoolcraft's apartment in Johnstown,	3	WITNESS ATTORNEY PAGE
4	New York?	4	TIMOTHY TRAINOR MR. SMITH 5
5	A. No.	5	MS. PUBLICKER METTHAM 246
6	Q. Did you ever kick or pound on	6	MR. LEE 247
7	Officer Schoolcraft's door?	7	
8	A. No.	8	E-X-H-I-B-I-T-S
9	Q. Did you ever engage in efforts	9	PLAINTIFF'S DESCRIPTION PAGE
10	purposely designed to intimidate and harass	10	76 Document 28
11	Mr. Schoolcraft?	11	77 Document 39
12	A. No.	12	78 Document 65
13	MS. PUBLICKER METTHAM: I have	13	79 Document 82
14	no further questions.	14	80 Document 91
15	EXAMINATION BY	15	81 Document 96
16	MR. LEE:	16	82 Document 98
17	Q. Did you ever speak to or do you	17	83 Document 119
18	know Dr. Isakov?	18	84 Document 121
19	A. No, I do not.	19	85 Document 125
20	Q. Do you know Dr. Aldana Bernier?	20	86 Document 125
21	A. No.	21	87 Document 129
22	Q. Did you ever speak to her about	22	88 Document 132
23	Mr. Schoolcraft?	23	89 Document 138
24	A. No, I did not.	24	90 Document 142
25	Q. Did you speak to anybody at	25	(Continued)

63 (Pages 246 - 249)

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Page 1

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 ADRIAN SCHOOLCRAFT,
4 Plaintiff,

Case No:

6 - against - 10 CV 06005

THE CITY OF NEW YORK, ET AL.,

9 Defendants.

Defendants.

111 Broadway

111 Broadway

New York, New York

12 April 11, 2014

April 11, 2014

13 10:21 a.m.

15
16 DEPOSITION OF WILLIAM GOUGH, pursuant to
17 Notice, taken at the above place, date and
18 time, before DENISE ZIVKU, a Notary Public
19 within and for the State of New York.

Page 2

1

2 A P P E A R A N C E S:

3

4 NATHANIEL B. SMITH, ESQ.
5 Attorneys for Plaintiff
6 111 Broadway
7 New York, New York 10006

8

9

10 JOHN LENOIR, ESQ.
11 Attorneys for Plaintiff
12 829 Third Street NE
13 Washington, D.C. 20002

14

15 NEW YORK CITY LAW DEPARTMENT
16 OFFICE OF CORPORATION COUNSEL
17 Attorneys for Defendant
18 THE CITY OF NEW YORK
19 100 Church Street
20 New York, New York 10007
21 BY: SUZANNA PUBLICKER METTHAM, ESQ.

22

23

24 SCOPPETTA SEIFF KRETZ & ABERCROMBIE
25 Attorneys for Defendant
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27 444 Madison Avenue
28 New York, New York 10022
29 BY: WALTER A. KRETZ, JR., ESQ.

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50 (Continued.)

Page 3

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(Continued.)

2

3 CALLAN, KOSTER, BRADY & BRENNAN, LLP

4 Attorneys for Defendant

5 DR. LILIAN ALDANA-BERNIER

6 One Whitehall Street

7

8 New York, New York 10004

9

10 BY: MATTHEW J. KOSTER, ESQ.

11

12

13 MARTIN CLEARWATER & BELL, LLP

14

15 Attorneys for Defendant

16

17 JAMAICA HOSPITAL MEDICAL CENTER

18

19 220 East 42nd Street

20

21 New York, New York 10017

22

23 BY: BRIAN OSTERMAN, ESQ.

24

25

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1 S T I P U L A T I O N S:

2 IT IS HEREBY STIPULATED AND AGREED by
3 and between the attorneys for the respective
4 parties hereto, that this examination may be
5 sworn to before any Notary Public.

6

7 IT IS FURTHER STIPULATED AND AGREED
8 that the filing and certification of the said
9 examination shall be waived.

10

11 IT IS FURTHER STIPULATED AND AGREED
12 that all objections to questions, except as to
13 the form of the question, shall be reserved
14 for the time of trial.

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Page 5

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2 MR. SMITH: We are going on the
3 record. It's 10:21 and this is April
4 11, 2014 and we are taking the
5 deposition of Lieutenant Gough.

6 Am I pronouncing that correctly?

7 THE WITNESS: Yes, you are.

8 MR. SMITH: Great. At my office
9 at 111 Broadway, New York, New York.
10 The deposition is being videotaped and
11 the court reporter is here and will
12 swear in the witness. Thank you.

13 W I L L I A M G O U G H, a Defendant
14 herein, having been first duly sworn by a
15 Notary Public within and for the State of
16 New York, was examined and testified as
17 follows:

18

19 EXAMINATION BY

20 MR. SMITH:

21

22 Q. Will you state your name and
23 address for the record, please.

24 A. William Gough, 211 Union Avenue,
25 Brooklyn, New York 11212.

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Page 6

1 WILLIAM GOUGH

2 Q. Is that your home address?

3 A. No.

4 MR. SMITH: As we've done in the
5 past with other defendants, Suzanna,
6 will you agree to accept service of
7 process on behalf of Lieutenant Gough
8 in this case?

9 MS. PUBLICKER METTHAM: To the
10 extent we still represent him at that
11 time, yes.

12 MR. SMITH: If you don't
13 represent him, you will provide the
14 necessary information to serve process?

15 MS. PUBLICKER METTHAM: Yes.

16 Q. Where are you currently working?
17 A. The Brooklyn North
18 Investigations Unit, New York City Police
19 Department.

20 Q. And the address that you gave,
21 is that Brooklyn North Investigations Unit's
22 address?

23 A. Yes.

24 Q. Do they have more than one
25 location?

1 WILLIAM GOUGH

2 A. No.

3 Q. How long have you worked at the
4 Brooklyn North Investigations Unit?

5 A. Since December '06.

6 Q. What's your current title?

7 A. I am a lieutenant in the New
8 York City Police Department.

9 Q. What's your year of birth?

10 A. 1972.

11 Q. What's your highest level of
12 education?

13 A. I have 96 college credits.

14 Q. Any course of study?

15 MS. PUBLICKER METTHAM:

16 Objection. You can answer.

17 A. Liberal arts.

18 Q. So when did you graduate high
19 school?

20 A. June of 1990.

21 Q. After high school what form of
22 employment did you have?

23 A. Various forms of employment.

24 Q. Okay, I'll take the first one.

25 A. I recollect I worked for Kennedy

Page 249

1 WILLIAM GOUGH

2 to the recording, you believe that
3 everything you said was correct?

4 MS. PUBLICKER METTHAM:

5 Objection. You could answer.

6 A. Yes.

7 Q. And you listened to the entire
8 recording?

9 MS. PUBLICKER METTHAM:

10 Objection. You could answer.

11 A. Yes.

12 Q. Was it about 20 minutes?

13 A. I didn't -- I don't know if it's
14 20 minutes.

15 Q. You believe you listened to the
16 entire recording of the interview that you
17 had with IAB?

18 A. I believe so.

19 MR. SMITH: All right, thank
20 you, Lieutenant. I don't have any more
21 questions.

22 EXAMINATION BY

23 MR. KOSTER:

24 Q. Good afternoon, I just have a
25 couple of questions for you. Same rules

Page 250

1 WILLIAM GOUGH

2 apply.

3 Have you spoken with a Dr.

4 Aldana Bernier regarding Adrian Schoolcraft?

5 A. Never.

6 Q. Have you ever heard of Dr.

7 Aldana Bernier?

8 A. I don't believe so.

9 Q. Have you ever heard of her
10 outside the context of this lawsuit?

11 A. I don't think so.

12 Q. Have you ever heard of a Dr.
13 Isakov?

14 A. I don't think so.

15 Q. Have you ever communicated in
16 any way with Dr. Isakov --

17 A. No.

18 Q. -- regarding Adrian Schoolcraft?
19 Is that a no?

20 A. No.

21 Q. Were you ordered to provide any
22 information to anyone at Jamaica Hospital?

23 A. No.

24 Q. Did you order anyone to provide
25 any information to Jamaica Hospital

Page 251

1 WILLIAM GOUGH

2 concerning Adrian Schoolcraft?

3 A. No.

4 Q. I believe you said that you did
5 not go to Jamaica Hospital with --

6 A. I did not go to Jamaica
7 Hospital.

8 Q. -- with Mr. Schoolcraft?

9 A. I did not.

10 Q. Did you speak to anyone at
11 Jamaica Hospital regarding Adrian
12 Schoolcraft?

13 A. No.

14 MR. KOSTER: I have no further
15 questions.

16 MR. SMITH: We are going off,
17 4:28, going off the record.

18 (Time noted: 4:28 p.m.)

19

20 WILLIAM GOUGH

21 Subscribed and sworn to before me this
22 day of _____ 2014.

23

24 _____, Notary
25 _____, Public.

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X

4 ADRIAN SCHOOLCRAFT,
5 Plaintiff,

6 Case No:
7 - against - 10 CV 06005

8 THE CITY OF NEW YORK, ET AL.,

9 Defendants.

10 -----X
11 111 Broadway
12 New York, New York

13 May 14, 2014
14 10:24 a.m.

15
16 DEPOSITION OF JESSICA MARQUEZ, pursuant to
17 Notice, taken at the above place, date and
18 time, before DENISE ZIVKU, a Notary Public
19 within and for the State of New York.

20
21
22
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25

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